

Christie Andrews 8/23/2022

1 Q. Do you play any instruments?

2 A. No. Well, a little guitar, but I'm not  
3 great.

4 Q. A little guitar you said?

5 A. Yeah. Not great, though. And that was  
6 back in the day. I don't even know if I could  
7 still do it.

8 Q. All right. So we've talked about your  
9 hobbies. We talked about kind of working out,  
10 your cheerleading history.

11 What else do you like to do for fun? Do  
12 you like to go to bars?

13 A. I did, like, but I haven't -- ever since  
14 the pandemic, like, kind of shut everything down,  
15 I never really started being social or going out  
16 like that again, just because most of my friends  
17 got married and had babies during the pandemic.

18 Q. Do you like to go out to eat?

19 A. Uh-huh (affirmative response).

20 MR. ARCINIEGAS: Is that "yes"?

21 THE WITNESS: Yes. Sorry.

22 Q. (By Ms. Hart) What about traveling? Do  
23 you like to travel?

24 A. Yes, I do.

25 Q. Okay. Have you traveled anywhere good

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1 her husband, and their three kids.

2 Q. Okay. Family trip?

3 A. Yes.

4 Q. Anywhere else in 2021?

5 A. I don't believe so.

6 Q. When did you start working for Tri Star?

7 A. I started working for Tri Star in  
8 February of 2014, and then I started working for  
9 them full-time in August of 2014.

10 Q. All right. What did you do in  
11 February of 2014? What was your first position?

12 A. I was a runner.

13 Q. What does that mean?

14 A. I ran errands for them around  
15 Los Angeles.

16 Q. And then in August of 2014, you got  
17 bumped up to full-time, right?

18 A. Yes.

19 Q. Okay. And what was your position then?

20 A. Administrative assistant.

21 Q. And this is all in the L.A. office,  
22 correct?

23 A. Yes, ma'am.

24 Q. What did you do as the administrative  
25 assistant? Did you work for a certain person?

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1 A. No, for the whole office.

2 Q. Whole office.

3 All right. And then, at some point, do  
4 you get promoted or a new position?

5 A. Yes. Then I moved to client services.

6 Q. When was that?

7 A. 2015, '15.

8 Q. And what was that position? What did  
9 you do?

10 A. I was a client services representative  
11 for a certain book of business.

12 Q. So did you communicate directly with the  
13 client?

14 A. Yes, sometimes.

15 Q. Okay. And did you work on a team?

16 A. So in L.A., there was -- we weren't  
17 really, like, in separate teams. We were all kind  
18 of one because it was a small office.

19 Q. All right. What were some of your job  
20 duties when you were client services?

21 A. So for client services, you kind of --  
22 you're responsible for everything that falls  
23 outside of accounting. So you would procure  
24 documents, you would handle real estate and auto  
25 purchases or maintenances. Sorry. There -- it

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1 was always -- there was a lot, always.

2 Like one time we had a client whose  
3 house, like, flooded because she had a busted  
4 pipe, so I had to go to the house, and I crawled  
5 underneath the house and I turned off the water  
6 with all the spiders. And then I -- and then I  
7 had to move all the things out of her closet to,  
8 like, help do that.

9 And so, I don't know, it was always  
10 different. It was always kind of crazy, so -- but  
11 it was -- then it was handling the flood  
12 mitigation for that and repairs, and eventually  
13 selling the house instead.

14 But just different things along that  
15 lines.

16 Q. Okay.

17 A. Or along those lines.

18 Q. And how long did you have that position?

19 A. I had that position until we change --  
20 well, it was partly the same position, except for  
21 that I transferred to Nashville, and then when I  
22 was in Nashville, we changed the title from client  
23 services to team coordinators.

24 Q. Okay. And you moved to Nashville in  
25 2017, right?

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1 A. Yes, March of '17.

2 Q. So when you moved to Nashville, you were  
3 still called client services?

4 A. Yes.

5 Q. When did they change the title, do you  
6 remember?

7 A. I do not.

8 Q. Your job duties were the same, though?

9 A. No, it became kind of bigger then. We  
10 became more -- we became more responsible for kind  
11 of coordinating the team as a whole and helping  
12 project manage certain aspects of the accounting  
13 team's responsibilities. It was just following  
14 the tracks of things.

15 So we became responsible for that, and  
16 then became responsible for all of the insurance,  
17 renewals or getting new policies, just making sure  
18 that there were no gaps anywhere, just trying to  
19 shore up any holes in the insurance. We became  
20 responsible for that as well.

21 Q. Okay. And when you say "we," what do  
22 you mean?

23 A. The team coordinators.

24 Q. And was that a change that came because  
25 you moved to Nashville or because your title

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1 changed?

2 A. Neither.

3 Q. Okay.

4 A. I think it was a change that came about  
5 because we were having -- we were having to shore  
6 up a lot of holes and gaps, and especially in the  
7 employer insurance.

8 So it was a really big project, and so  
9 the team coordinators kind of stepped -- they had  
10 the team coordinators step in to fill that.

11 Q. Was it a project you were doing --  
12 taking on for all clients, making sure everybody  
13 had insurance?

14 A. From my book of business.

15 Q. For your book of business?

16 A. Yes.

17 Q. Okay. And how many clients were in your  
18 book of business?

19 A. It changed kind of quite often, but I  
20 know at one point I counted the, like, business  
21 entities of them and it was somewhere around 160  
22 business entities for all those clients, but I  
23 can't remember how many clients it was specific.

24 Q. More than one?

25 A. Oh, yes; yes.

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3 Q. Okay.

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5 because we were having -- we were having to shore  
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21 entities of them and it was somewhere around 160  
22 business entities for all those clients, but I  
23 can't remember how many clients it was specific.

24 Q. More than one?

25 A. Oh, yes; yes.

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1 and you're following it.

2 And then if it was, like, a real estate  
3 purchase, of course, you're going to have to  
4 collaborate because you're going through different  
5 legal documents, you're going through loans and  
6 payments and scheduling, and all sorts of things.  
7 So, of course, you're collaborating there.

8 And there was other things that would be  
9 just me.

10 Q. Did you supervise anybody as a team  
11 coordinator?

12 A. I was the team lead for team  
13 coordinators.

14 Q. What does that mean?

15 A. It means that I was their -- I wasn't  
16 like their supervisor in the way like Bryan was  
17 their business manager, was their supervisor. But  
18 I was their support system and their -- the person  
19 that they called when they didn't know what to do,  
20 and I helped build the policy and procedure for  
21 the team coordinators, and I would handle their  
22 training schedules and training them. And then I  
23 was basically there to just support them and help  
24 them, because every day you would come up with  
25 something that wasn't exactly, like, in the



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1 training materials because everything was  
2 different, but I probably would have had  
3 experience on how to do that, so they would come  
4 to me and they would ask me how to do it, and I  
5 would either help them or if it was something they  
6 didn't feel confident doing, I would do it for  
7 them.

8 Q. And when you say "them," who are you  
9 talking about?

10 A. The team coordinators.

11 Q. All team coordinators?

12 A. Yes, Nashville and L.A., yes.

13 Q. Were you ever involved in disciplining  
14 any team coordinator?

15 A. No.

16 Q. Did you ever terminate anybody?

17 A. No.

18 Q. Did you ever do any performance reviews  
19 for anybody?

20 A. Not that I recall.

21 Q. Did you have any involvement in hiring  
22 team coordinators?

23 A. Yes.

24 Q. What was that?

25 A. So I was part -- well, I was part of the

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1 interviewing process for when we brought on Ambra  
2 and Shelly. And then I can't remember if there  
3 were team coordinators that I was reviewing when  
4 we were -- when I was doing candidate reviews  
5 for -- for -- she was the HR previous to Yolanda.  
6 I can't remember her name right now. I was  
7 helping her with candidate reviews, so I can't  
8 remember if there was team coordinators in that  
9 process or not.

10 Q. Okay. So did you help with candidate  
11 reviews for positions other than team coordinator?

12 A. Yes.

13 Q. And you said you were part of the  
14 interview process for Ambra and Shelly?

15 A. Yes.

16 Q. What do you mean by that?

17 A. I mean, I was in their interviews --

18 Q. Okay.

19 A. -- when they interviewed for the  
20 position.

21 Q. Okay. And did you get any say in  
22 whether they were hired?

23 A. Yes, I felt like I had say.

24 Q. You, at least, got to give your opinion?

25 A. Yes.

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1 Q. Okay. What was your opinion of Ambra?

2 Did you think she was a good fit?

3 A. Yeah, I did.

4 Q. What about Shelly?

5 A. Shelly, she was my second choice to  
6 Ambra. I didn't know we were going to get to hire  
7 two at that time. So Ambra was my first choice,  
8 and then Shelly, yes.

9 Q. Do you have any involvement with -- did  
10 you have any involvement with job postings online?

11 A. I did not post the jobs. I believe I  
12 reviewed the -- the description for team  
13 coordinators or helped -- I can't remember what I  
14 did for the team coordinator description, but I  
15 know I was involved in that, and then -- sorry,  
16 can you repeat the question?

17 Q. Sure. Yeah.

18 What was your involvement with job  
19 postings for team coordinator positions?

20 A. Oh, for the team coordinator positions,  
21 yeah. I don't remember exactly what it was that I  
22 did. I know that I was helping with the  
23 description of the role. I can't remember exactly  
24 what it was that I did.

25 Q. Did you ever communicate with any

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1 outside job posting company?

2 A. No. The HR, I believe, would have  
3 posted it.

4 Q. Do you have any knowledge of dates of  
5 job postings for team coordinator?

6 A. I know that it was posted after I was  
7 terminated.

8 Q. Okay.

9 A. And I believe we were looking for a new  
10 team coordinator sometime before I was terminated.

11 Q. Okay. When you say, "I know that it was  
12 posted after I was terminated," how do you know  
13 that?

14 A. I saw it. I came across it when I was  
15 looking for jobs myself.

16 Q. Where did you see it?

17 A. Indeed.com.

18 Q. Do you have any knowledge of who posted  
19 that?

20 A. No, I'm -- no.

21 Q. Do you have any knowledge of when it was  
22 posted?

23 A. I saw it sometime in April, but I took a  
24 screenshot of it in May.

25 Q. Do you have any knowledge of whether it

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1 was posted before April?

2 A. That specific post?

3 Q. Uh-huh (affirmative response).

4 A. No. I know that we had posted  
5 previously to -- or prior to the pandemic that we  
6 were looking for team coordinators, but I couldn't  
7 tell you if it was a post that was reposted, if it  
8 was -- I couldn't tell you that.

9 Q. Okay. So you wouldn't have any  
10 knowledge of whether it was like an evergreen post  
11 that's just always up?

12 A. It had a date, it's only been up for so  
13 many days' type thing on it.

14 THE WITNESS: Do you know what time it  
15 is?

16 MR. ARCINIEGAS: 10:11.

17 THE WITNESS: Will you tell me when it's  
18 10:30, please?

19 Thank you.

20 Q. (By Ms. Hart) When you moved to  
21 Nashville in 2017, whose idea was that?

22 A. I know I had, like, wanted to move,  
23 because I knew I wanted to be closer to my  
24 parents. I can't remember if it was Lou's idea or  
25 Teresa's idea. No, Teresa wasn't there anymore,

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1 so that can't be right. I think it was Lou's.

2 Q. It wasn't your idea to move?

3 A. No. I was very excited to be offered  
4 it, but it wasn't what I had -- like it -- I  
5 didn't ask for -- I didn't even know that the  
6 person I was taking their place was leaving at the  
7 time.

8 Q. Okay. And did your salary change when  
9 you moved?

10 A. No.

11 Q. And Tri Star covered your moving  
12 expenses, correct?

13 MR. ARCINIEGAS: Object to form. Object  
14 to form.

15 You can answer.

16 THE WITNESS: Okay. Yes, they covered  
17 the -- the shipping of my stuff. And I -- I  
18 cannot recall if they paid for my flights or  
19 not.

20 Q. (By Ms. Hart) Okay.

21 A. Sorry.

22 Q. Did you have a desktop computer when you  
23 were a team coordinator?

24 A. I had a laptop.

25 Q. Only a laptop?

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1 consistent, yes.

2 Q. And did you always get approval before  
3 you took it home?

4 A. Yeah, I would usually talk to Bryan  
5 about it before I did it. That was kind of our --  
6 our way of keeping it in check.

7 Q. Did you have a personal computer at that  
8 time?

9 A. Yes.

10 Q. Did you ever do any work on that?

11 A. No.

12 Q. Do you know if you were allowed to do  
13 work on your personal computer?

14 A. No. Sometimes I -- sometimes I would  
15 have to do things, like, on my phone, but I was  
16 not supposed to ever use my personal laptop.

17 Q. What kinds of things did you do on your  
18 phone?

19 A. Mostly AmEx-related items, because they  
20 were usually like an emergency.

21 Q. What type of items?

22 A. Usually if it was, like, an emergency,  
23 it was because someone's card was being declined  
24 or -- if they were at a point of sale or type of  
25 item where they're, like, actually out doing

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1 something and their card is getting declined,  
2 that's usually, like, right there an emergency.

3 And then we had one client who just  
4 consistently, like, would max out his cards on his  
5 tour, and so -- and we -- I would file for  
6 exceptions to his limit, and he would still  
7 somehow go over it. So I kind of always knew when  
8 that was coming, so I would make sure I had my  
9 computer at home with me for those nights, because  
10 it was usually, like, later in the evening that  
11 that would come up, because he was an L.A. client.

12 Q. Okay. What other things did you do on  
13 your phone?

14 A. Mostly e-mails.

15 Q. Anything else?

16 A. Every once in a while, I might have had  
17 to, like, log in to a utility account or something  
18 along those lines.

19 Q. And when you were dealing --

20 A. Or just be on the phone. Sorry.

21 Q. When you were dealing with AmEx issues,  
22 are clients e-mailing you or calling you?

23 A. Usually the account manager would be  
24 calling me or e-mailing me, yes.

25 Q. Okay. And then what do you do? You



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1 A. Yes.

2 Q. Have you violated it?

3 A. No.

4 Q. Have you talked to anybody about your  
5 work at Tri Star?

6 A. People that, like, I apply for jobs  
7 with, yes.

8 Q. Okay. And you just tell them that you  
9 worked there?

10 A. They asked, like, what my  
11 responsibilities used to be and all that good  
12 stuff, and, like, how I interacted with people or  
13 if I had, like, super -- like, manager-type roles  
14 and stuff and how I handled stuff like that.

15 Q. Prior to March 2020, did you know of any  
16 team coordinators who worked from home regularly?

17 A. No.

18 Q. What about in March 2020?

19 A. No. I think Ambra might have worked  
20 from home one day, but not -- I don't know if it  
21 was, like, a full work-from-home or not. I think  
22 she just was at home one day working. I think  
23 something with her kid. I'm not sure.

24 Q. How do you know that?

25 A. I just remember her having to be home

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1 for her kid for something. I don't remember  
2 exactly the circumstances. Sorry.

3 Q. That was while you were still employed  
4 at Tri Star?

5 A. Uh-huh (affirmative response); yes.

6 Q. Are you aware of any other team  
7 coordinators who worked from home during March  
8 2020?

9 A. Not that I'm aware, no.

10 Q. Are you aware of any team coordinators  
11 who worked from home after March 2020?

12 A. I wouldn't know that.

13 Q. All right. I'm going to ask you the  
14 same questions, but a little bit different --

15 A. Okay.

16 Q. -- about people that aren't team  
17 coordinators.

18 So other than team coordinators, are you  
19 aware of anybody that worked from home prior to  
20 March 2020?

21 A. Yes.

22 Q. Who was that?

23 A. Account managers and Peggy and Lou, and  
24 I believe Lindsey Herman had worked from home a  
25 few times, and maybe Nola had worked from home a

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1 few times. I can't remember exactly, but people  
2 did work from home occasionally, yes.

3 Q. You said Nola. You're talking about  
4 Nola Douglas?

5 A. Yeah, I feel like she was sick at some  
6 point prior, and she had worked from home for a  
7 few days, if I'm remembering correctly.

8 Q. What was her position at that time?

9 A. She was the transition coordinator. So  
10 she was like the team coordinator but for the  
11 transition team.

12 Q. When did she work from home?

13 A. I -- I couldn't recall. It's just a --  
14 I just feel like I remember it. I don't remember  
15 when it was.

16 Q. Okay. What about Lindsey Herman, when  
17 did she work from home?

18 A. I -- I couldn't tell you a date. I  
19 don't remember.

20 Q. What was her position when she worked  
21 from home?

22 A. She was -- oh, when she worked from  
23 home?

24 Q. Uh-huh (affirmative response).

25 A. I -- oh, oh, I -- sorry, I understand.

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1 Q. Who else worked from home prior to  
2 March 2020?

3 A. There's a lot of employees. It's hard  
4 to tell you everyone. I know Cindy, my friend,  
5 Cindy, who was previously employed, I know she  
6 worked from home sometimes.

7 Q. What was her position?

8 A. She was an account manager.

9 I believe -- I believe Brea had worked  
10 from home once in a while. I mean, I had worked  
11 from home when I was sick one time. I don't know.

12 There's a lot of people. It's hard for  
13 me to give you every name. I'm so sorry.

14 I think Jodi Williams had worked from  
15 home a couple of times.

16 Oh, I think Erica was consistently  
17 working from home at the time.

18 Q. What's Erica's last name?

19 A. She got married, and she was -- was it  
20 Clickner?

21 COURT REPORTER: I'm sorry.

22 THE WITNESS: Clickner maybe. Click- --  
23 I'm not sure. I'm sorry.

24 And then -- and then maybe it was Mathis  
25 was her new last name. I can't remember.

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1 good family friend had just passed away. There  
2 was a lot going on. So it's hard for me to recall  
3 the things that happened in March of 2020. And  
4 the pandemic on top of it, so I don't know.

5 MR. ARCINIEGAS: It's been an hour. I  
6 think we'll take a break, if that's okay with  
7 you.

8 MS. HART: Sure, absolutely.

9 THE WITNESS: Is it 10:30?

10 MR. ARCINIEGAS: Yeah. Sorry. And I  
11 can hear my dog in the bathroom.

12 VIDEOGRAPHER: The time is 10:29. We  
13 are off record.

14 (A short break was taken.)

15 VIDEOGRAPHER: This is the beginning of  
16 case file number 2. Time is 10:44. We are  
17 back on record.

18 Q. (By Ms. Hart) Ms. Andrews, before the  
19 break, we had talked about your AmEx duties, your  
20 American Express duties.

21 A. Yes.

22 Q. And that you did those sometimes after  
23 hours, correct?

24 A. Yes. Sometimes, yes.

25 Q. Did other team coordinators have laptops

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1 that you're aware of?

2 A. I believe Ambra might have had the same  
3 setup as me. I can't be sure. I know that when  
4 we got the laptops, it was Nola, Anna, and myself.  
5 So if Ambra got Anna's computer, maybe, but I  
6 don't really remember. I wouldn't -- I can't  
7 remember. I'm sorry. No, I think Ambra  
8 definitely had a computer towards the end there.  
9 Yes, I think.

10 Q. Okay.

11 A. I'm sorry.

12 Q. So Ambra maybe had a laptop?

13 A. Yes. Because we had to bring our  
14 laptops into, like, the meetings that we were  
15 running, so I think she was using her laptop. I  
16 saw her with a laptop, how about that? Does that  
17 work? I'm not sure if that was her, like, full  
18 computer or not.

19 Q. Okay. Are you -- do you know of any  
20 other team coordinators that had a laptop?

21 A. Nola. Nola had one.

22 Q. And did you have a laptop primarily for  
23 those AmEx duties?

24 A. The -- no. I think we were assigned the  
25 laptops because of where we were sitting at the

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1 Q. In March 2020, were you the only AmEx  
2 liaison?

3 A. Yes.

4 Q. So let's just talk about 2020 --

5 A. Okay.

6 Q. -- the last couple of months of your  
7 employment.

8 You're a team coordinator and AmEx  
9 liaison, correct?

10 A. Yes.

11 Q. You're the only AmEx liaison?

12 A. Yes.

13 Q. So how much time are you spending on  
14 AmEx on average? You can -- daily, weekly,  
15 monthly. Whatever is easy for you to quantify.

16 A. It's so hard to, like, say just because  
17 every day would be different. I would say it was  
18 anywhere from, like, 10 percent of my day to  
19 60 percent of my day, depending on the day.

20 Q. Okay. Did your laptop have a VPN?

21 A. Yes.

22 Q. How do you know that?

23 A. I was told.

24 Q. By who?

25 A. By Chris Jaffe, Jaffe, and probably had

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1 spoke to Mike about it a few times, Mike Iverson  
2 something. It's a long name. Starts with an "I."

3 Q. Okay.

4 A. And it might be, like Icelandic or  
5 something in that type of -- or Swedish or, I  
6 don't know, one of those type of languages.

7 Q. When you logged in to your laptop at  
8 home, were you logging onto a cloud?

9 A. We used to use something called Citrix  
10 or something, but that, I think, was from before.  
11 I can't remember how -- how we did what. I think  
12 I used Citrix when I had the desktop and was,  
13 like, remote view. And that would have been -- I  
14 don't remember. I'm sorry. I know I used  
15 StarlingX. That was our -- like, our Tri Star  
16 platform.

17 Q. When you used Citrix, was that in L.A.  
18 only, or did you use that in Nashville?

19 A. I can't remember. I don't -- I just  
20 remember that name. I don't remember why or what  
21 it was used for.

22 Q. We've talked a lot about your duties as  
23 a team coordinator. Is it fair to say that team  
24 coordinator is an administrative role?

25 A. No.



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1 A. Yes.

2 Q. So when you say you were without hot  
3 water until the next day, what do you mean?

4 A. So we lived that whole day and then the  
5 following day.

6 Q. You had hot water back?

7 A. Yes.

8 Q. How else were you affected by the  
9 tornado?

10 A. I mean, besides from just being up all  
11 night for it. I mean, all the traffic lights and  
12 stuff around us were out, but...

13 Q. Did you have any property damage?

14 A. No, I did not.

15 Q. Did you know anybody that had property  
16 damage?

17 A. Yes. Yeah.

18 Q. Do you know anybody that got hurt or  
19 killed?

20 A. No.

21 Q. And you said you also had a close family  
22 friend that passed away?

23 A. Yes.

24 Q. When was that?

25 A. That was -- the funeral was on

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1 March 14th.

2 Q. Where was the funeral?

3 A. Prattville, Alabama.

4 Q. Did you get to go to that?

5 A. Yes.

6 Q. Who was the friend that passed away?

7 A. He's like an adopted grandpa, I'd say.

8 I mean, I don't know how else to explain. He was  
9 Pop-Pop.

10 Q. Pop-Pop?

11 A. Yeah.

12 Q. What was his name?

13 A. Joel Griswold.

14 Q. Okay. And on top of all of that, of  
15 course, in March 2020, we have a pandemic  
16 happening, correct?

17 A. Yeah.

18 Q. Would you agree with me that March 2020  
19 was a time of chaos?

20 A. There was definitely chaos in my life.  
21 It seemed like it was chaos in other people's  
22 lives, yes, and the world.

23 Q. What kind of effect, at all, did that  
24 have on you? Were you having trouble sleeping?

25 A. I'm a bad sleeper, so I -- I always have

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1 Q. And when you say you "reached out to  
2 her," who are you talking about?

3 A. My primary care doctor, Autumn Nelson.

4 Q. How did you reach out to her?

5 A. I believe I would have reached out via  
6 the Healow app, is how I normally communicate with  
7 her.

8 Q. Like a secure messaging?

9 A. Uh-huh (affirmative response). Yes,  
10 within, like, the patient portal-type system.

11 Q. And what kind of steroids were you on in  
12 March 2020 for your asthma?

13 A. So I take -- I take Singulair, and at  
14 the time I thought that was a steroid, because the  
15 previous asthma medication I had been on was a  
16 steroid, and she assured me that Singulair wasn't  
17 a steroid. But the -- the Flonase-type situation,  
18 that's a steroid, and then the rescue inhaler has  
19 steroids in it.

20 Q. And did she respond to you when you  
21 reached out?

22 A. Yes.

23 Q. What did she say?

24 A. She said to keep taking my daily  
25 medications as normal and -- I don't remember what

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1 Q. Did she tell you how you could avoid  
2 being exposed?

3 A. Yeah, I mean, she talked about staying  
4 home. She felt that it was -- that it was the  
5 public's, like, duty to stay home. That's how she  
6 felt about it.

7 Q. What kind of nurse is she?

8 A. She's an RN. She's, I believe,  
9 currently -- she's -- I don't think it's any  
10 special, like, titles. I know she currently works  
11 in wound care, and before that, she worked in a  
12 hospital in Fort Walton Beach, Florida.

13 Q. Does she live in Florida?

14 A. Now she lives in Nashville.

15 Q. Okay. And you said you spoke with  
16 your -- we'll put air quotes around it, "Aunt  
17 Carla"?

18 A. Uh-huh (affirmative response).

19 Q. What's her last name?

20 A. Parish.

21 Q. When did you talk to her?

22 A. I believe I spoke to her, like, that --  
23 I guess it was either that Saturday or Sunday,  
24 because I was still in Prattville. I spoke to her  
25 on the phone with my parents because we were all

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1 together.

2 Q. Is she a healthcare provider?

3 A. Yes.

4 Q. What is she?

5 A. She's -- she's a -- I know she used to  
6 be a flight nurse, and then she was in charge of,  
7 like, one of the base hospitals, but she's an Air  
8 Force nurse, I believe, or something.

9 Q. She's a nurse?

10 A. I believe she's a nurse. I believe  
11 that's right, but I can't decide if I'm confusing  
12 her position with my aunt, who was a flight nurse.  
13 That's why I'm getting confused. I believe she's  
14 a nurse.

15 Q. And what did you talk to Carla about in  
16 regards to COVID and asthma?

17 A. We talked about my parents a lot. I  
18 think it was mostly in reference to their age  
19 and -- because my dad has, like, a heart murmur,  
20 so we always get concerned with viruses around  
21 him, because he had rheumatic fever growing up.  
22 So we talked about stuff like that. And we talked  
23 about my asthma and all those things. And she  
24 said to -- she was mostly saying, like, we just  
25 have to wait and see what's happening, is how she

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1 felt about it at the time.

2 Q. Did you talk to any other healthcare  
3 providers about -- in that March 2020 time frame  
4 about your concerns with COVID and asthma?

5 A. I don't recall.

6 Q. I think you said you were at the funeral  
7 with your parents, right?

8 A. Yes.

9 Q. Okay. How many people were at that  
10 funeral?

11 A. A lot.

12 Q. What's "a lot"?

13 A. He was well-beloved. There was over a  
14 hundred, I would say.

15 Q. Did you miss work for the funeral?

16 A. I can't remember if I took a half day or  
17 if I left after work. I got into Prattville later  
18 in the day, so I might have left after work, but  
19 I -- I can't remember.

20 Q. Was it in a funeral home or in a church?

21 A. A church.

22 Q. And was there any kind of reception  
23 afterwards?

24 A. No, the family all went -- we went back  
25 to -- to the house and had, like, barbecue or

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1           A.    I think that the way I managed, like,  
2   the projects I'm working on, I spend the  
3   appropriate amount of time on those projects and  
4   not more or less than I should be.

5           Q.    Okay.  Would you agree that you missed  
6   an excessive amount of work?

7           MR. ARCINIEGAS:  Object to form.  
8           Go ahead.

9           THE WITNESS:  No, I was never without my  
10   allotted vacation and sick time, so no.

11          Q.    (By Ms. Hart)  Would you agree that you  
12   were late to work often?

13          A.    Yes.

14          Q.    Would you agree with me that your  
15   tardiness became an issue?

16          MR. ARCINIEGAS:  Object to form.  
17          Go ahead.

18          THE WITNESS:  Became an issue for  
19   certain people.  I don't believe it became an  
20   issue for me getting my work done.

21          Q.    (By Ms. Hart)  Okay.  You said it  
22   "became an issue for certain people."  What do you  
23   mean by that?

24          A.    Heather Kinder.

25          Q.    Explain that to me.

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1           A.    I just think that she was constantly,  
2    like, bringing up when I arrived and when I didn't  
3    or if I wasn't exactly where she expected me to be  
4    at that time, then she thought I just wasn't in  
5    the office, when I could have been in other  
6    places. That happened a lot of times. She would  
7    be, like, "Well, you weren't here yet." And I  
8    was, like, "Well, did you check downstairs? Was I  
9    there?"

10                I mean, so it just -- I feel like it  
11    became a thing that, like, I was late, and then it  
12    just became this thing that got even bigger  
13    because she was always on it.

14           Q.    Did you think your tardiness was an  
15    issue for anyone else?

16                MR. ARCINIEGAS: Object to form.

17                Go ahead.

18                THE WITNESS: I think it was an issue  
19    for Bryan because he was having to address it  
20    whenever Heather would bring it up to him.

21           Q.    (By Ms. Hart) Do you agree you should  
22    be on time for work?

23           A.    Yes.

24           Q.    Was Tri Star patient with your tardiness  
25    issues?



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1 A. Yes, they were.

2 Q. Did you have a flex schedule at some  
3 point?

4 A. Yes.

5 Q. Tell me about that.

6 A. The flex was, like, a -- like, a late  
7 arrival-type thing where people could come in late  
8 or they could come in early to miss traffic.

9 Q. And were you on a flex schedule?

10 A. Yes.

11 Q. What was your schedule?

12 A. It was a later -- it was a later option.  
13 I don't remember what exactly it was.

14 Q. Was that something that was offered to  
15 everybody?

16 A. Yes.

17 Q. In L.A. or Nashville?

18 A. I don't know about L.A. In Nashville.

19 Q. It was when you were in Nashville?

20 A. Yes; yes.

21 Q. You were still required to be physically  
22 in the office, correct?

23 A. Yes.

24 Q. Do you agree that you were counseled  
25 multiple times about your attendance?

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1 MR. ARCINIEGAS: Object to the form,  
2 vague.

3 THE WITNESS: Not about my attendance,  
4 no.

5 Q. (By Ms. Hart) Were you counseled  
6 multiple times about something else?

7 A. About the arrival times, yes. It was  
8 once with Bryan and once with Trish.

9 Trish is the name of the HR that I  
10 couldn't remember earlier.

11 Q. All right. Let's go through some  
12 e-mails here.

13 MS. HART: Can you mark this one  
14 Exhibit 3?

15 (Exhibit 3 marked for identification.)

16 MR. ARCINIEGAS: Thank you.

17 Q. (By Ms. Hart) I've handed you what  
18 we've marked Exhibit 3. The Bates number is  
19 TRISTAR 196.

20 And is this the Sandra P. that you were  
21 talking about, Sandra Poynor?

22 A. Yes.

23 Q. So this is an e-mail from Sandra Poynor  
24 to Peggy on October 20th, 2016, and Sandra says,  
25 "I spoke to Christie at 2:00 p.m. today. We again

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1           Q.    And then if you go down to your last  
2   message at 4:28 p.m., you say, "Every night I go  
3   to bed saying, tomorrow, you will not be  
4   distracted, tomorrow you will leave the house at  
5   8:15, and then tomorrow comes, and I do the same  
6   things in the morning, like vacuum my living room  
7   or clean my shower."

8                    You agree it says that?

9           A.    Yes.

10          Q.    Do you remember this conversation with  
11   Bryan?

12          A.    No, not specifically.

13          Q.    Is that something that you would do,  
14   vacuum or clean your shower, instead of leaving  
15   for work?

16          A.    Yeah, my ADHD was going -- was in, like,  
17   what I can only describe as a manic phase at  
18   certain times. So it just -- you get -- you get  
19   very distracted by things, and you think, oh, I  
20   have five minutes to vacuum up this spill, and  
21   then you wouldn't, because you lose, like, your  
22   concept of time. So this is definitely something  
23   that I would have done.

24          Q.    And it would make you late to work in  
25   turn?

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1 A. Yeah; yeah.

2 MS. HART: We're going to mark this next  
3 one Exhibit 8.

4 (Exhibit 8 marked for identification.)

5 THE WITNESS: Thanks.

6 MR. ARCINIEGAS: Do you need your  
7 reading glasses?

8 THE WITNESS: No, I'm okay. Thank you.

9 Q. (By Ms. Hart) Exhibit 8 is Bates number  
10 TRISTAR 78, and the top of this e-mail chain here  
11 is from you to Bryan, April 9, 2019, and you say,  
12 "Thank you," to an e-mail that's right below.

13 A. Okay.

14 Q. Also April 9. Do you see that?

15 A. Uh-huh (affirmative response).

16 Q. And Bryan says, "Christie, like we  
17 discussed this afternoon, here is a recap of our  
18 meeting regarding not working" -- "not arriving to  
19 work on time."

20 Do you remember having a meeting with  
21 Bryan about not arriving to work on time?

22 A. A meeting with Bryan and Trish, yes.

23 Q. Okay. Number 1, he says, "Going  
24 forward, any delay beyond 9:30 requires  
25 communication via company e-mail."

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1           Q.    And then if you go down to your last  
2   message at 4:28 p.m., you say, "Every night I go  
3   to bed saying, tomorrow, you will not be  
4   distracted, tomorrow you will leave the house at  
5   8:15, and then tomorrow comes, and I do the same  
6   things in the morning, like vacuum my living room  
7   or clean my shower."

8                    You agree it says that?

9           A.    Yes.

10          Q.    Do you remember this conversation with  
11   Bryan?

12          A.    No, not specifically.

13          Q.    Is that something that you would do,  
14   vacuum or clean your shower, instead of leaving  
15   for work?

16          A.    Yeah, my ADHD was going -- was in, like,  
17   what I can only describe as a manic phase at  
18   certain times. So it just -- you get -- you get  
19   very distracted by things, and you think, oh, I  
20   have five minutes to vacuum up this spill, and  
21   then you wouldn't, because you lose, like, your  
22   concept of time. So this is definitely something  
23   that I would have done.

24          Q.    And it would make you late to work in  
25   turn?

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1 A. Yeah; yeah.

2 MS. HART: We're going to mark this next  
3 one Exhibit 8.

4 (Exhibit 8 marked for identification.)

5 THE WITNESS: Thanks.

6 MR. ARCINIEGAS: Do you need your  
7 reading glasses?

8 THE WITNESS: No, I'm okay. Thank you.

9 Q. (By Ms. Hart) Exhibit 8 is Bates number  
10 TRISTAR 78, and the top of this e-mail chain here  
11 is from you to Bryan, April 9, 2019, and you say,  
12 "Thank you," to an e-mail that's right below.

13 A. Okay.

14 Q. Also April 9. Do you see that?

15 A. Uh-huh (affirmative response).

16 Q. And Bryan says, "Christie, like we  
17 discussed this afternoon, here is a recap of our  
18 meeting regarding not working" -- "not arriving to  
19 work on time."

20 Do you remember having a meeting with  
21 Bryan about not arriving to work on time?

22 A. A meeting with Bryan and Trish, yes.

23 Q. Okay. Number 1, he says, "Going  
24 forward, any delay beyond 9:30 requires  
25 communication via company e-mail."

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1 "If yes, provide the employee's explanation of the  
2 misconduct."

3 You've got a very long explanation here,  
4 and the last paragraph starts with, "I do  
5 recognize..."

6 Are you with me?

7 A. Uh-huh (affirmative response).

8 Q. "I do recognize the need for improvement  
9 of punctual arrival time as of recent and of  
10 updating my time in OTP every day. I struggle  
11 daily to find the motivation to come to work."

12 You agree it says that?

13 A. Yes. It also says that, "I was told  
14 that entering OTP at the end of the week was  
15 acceptable," and that's what I was doing. So it's  
16 a mis- -- like it was -- the communication of that  
17 was the problem.

18 And yes, I was not wanting to come to  
19 work every day, because this is what Emory was  
20 doing every day, and I didn't want to be around  
21 her anymore. So yes, the lack of motivation to  
22 come was from her hostility. It was not from Tri  
23 Star, itself.

24 Q. Okay. So are you saying your inability  
25 to get to work on time was Emory's fault?

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1           A.    No, I'm saying that my -- I'm saying the  
2    lack of motivation right here (indicating) was  
3    Emory's fault. I had zero motivation to be around  
4    her, but that is not why I was late to work.

5           Q.    Okay.

6           MS. HART: Do you all want to take a  
7    lunch break?

8           MR. ARCINIEGAS: Whatever you guys want  
9    to do. We're here.

10          MS. HART: We've got a couple more hours  
11   to go.

12          MR. ARCINIEGAS: Yeah, we can take a  
13   break.

14          VIDEOGRAPHER: Time is 11:55 a.m. We  
15   are off the record.

16          (A lunch break was taken.)

17          VIDEOGRAPHER: This is the beginning of  
18   case file number 4, I apologize. Time is  
19   12:59. We are back on record.

20          Q.    (By Ms. Hart) Ms. Andrews, we're back  
21   on the record after a lunch break.

22                I want to talk to you now -- we've talked  
23   about your employment. I want to talk to you a  
24   little bit about your disability.

25                So you have sued Tri Star based on your



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1           A.    It was my school sports physical.

2           Q.    Had you noticed any symptoms of asthma  
3 before?

4           A.    I thought I was just, like, a really bad  
5 runner, is what I thought was happening. I hadn't  
6 experienced anything as far as, like, my normal  
7 triggers that I know now to be triggers.

8                   I thought that what -- like, I just  
9 thought the things that I had experienced in the  
10 past were, like, normal things, and I didn't know  
11 they weren't normal until the doctors said that's  
12 not normal.

13          Q.    Okay. And what kinds of things do you  
14 mean?

15          A.    Like some of my triggers, for instance,  
16 are, like, I can't -- like, if, like, wind is  
17 blowing in my face, I could, like, not be able to  
18 breathe, and, like, that's apparently not a normal  
19 thing. And, like, being in the cold, like, makes  
20 everything kind of constrict and be a problem.

21                   So I just -- again, I just thought this  
22 was, like, what everyone experienced. I didn't  
23 know it was anything to be alarmed about, but --  
24 and I had never had a serious attack except for,  
25 like, while running. And that was always -- I

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1 contact form that you produced.

2 And is this where you first told Tri  
3 Star that you have asthma?

4 A. Yes.

5 Q. Is that your signature on the second  
6 page there?

7 A. Yes.

8 Q. How did you come to have a copy of this  
9 document?

10 A. It was in my personal e-mails from when  
11 I first got hired. I had sent it in to Emory  
12 Colvin. And so it was there in my personal  
13 e-mails that I found it.

14 Q. Okay. You sent this document to Emory  
15 Colvin. Do you remember who else you sent it to?

16 A. I don't think there was anyone else on  
17 the e-mail, no.

18 Q. Do you still have that e-mail?

19 A. Yes. It didn't have anything in it  
20 except for that, "Here are the employment  
21 documents attached."

22 Q. Okay. And on this document, you say,  
23 "Asthma, no albuterol, will induce vomiting."

24 A. Yes, I have an allergy to albuterol.

25 Q. How do you know that?

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1           A.    Because in the emergency room, that's  
2    what they would administer, and I always end up  
3    vomiting when I use it.

4           Q.    When was the last time you had  
5    albuterol?

6           A.    I believe 2010. I was in New York, I  
7    think, is the last time I had it.

8           Q.    Okay. And then it says, is it Xopenex?

9           A.    Xopenex, yes.

10          Q.    Xopenex.

11          A.    Uh-huh (affirmative response).

12          Q.    "Xopenex inhaler in purse."

13          A.    Yes.

14          Q.    Is that a rescue inhaler?

15          A.    Yes. That's levalbuterol, so it's the  
16    mirrored medication of albuterol. And so the  
17    binding of it is different, like the chemical  
18    binding of it is different, but it has the same  
19    effect.

20          Q.    What other times -- and put aside March  
21    of 2020, because we're going to talk about that.  
22    But between submitting this document, Exhibit 11,  
23    and March of 2020, what other times did you tell  
24    anyone at Tri Star that you have asthma?

25          A.    I couldn't be sure of, like, all the

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1           A.    They're back to my normal migraines.  
2   They're not the -- what they were before, what  
3   they were during that time period.  Yes.

4           Q.    Do you remember ever telling Heather  
5   Kinder that you have asthma?

6           A.    I can't -- I can't be sure.  I'm sorry.

7           Q.    What about Bryan Luecke?

8           A.    Bryan knew, yes.

9           Q.    How did Bryan know?

10          A.    We had talked about it before a lot, and  
11   then we talked about it in 2020.

12          Q.    Okay.  But before March 2020, you talked  
13   to Bryan about your asthma?

14          A.    Uh-huh (affirmative response).

15          Q.    When?

16          A.    Well, we probably -- we had all talked  
17   about it a lot as a team, because Breya was also  
18   on our team and she, like, would have different  
19   asthma issues.  Hers wasn't like mine, but it  
20   was -- she still had asthma.  So it was good to  
21   know what one of us needed to do if something was  
22   happening to someone.

23          Q.    Okay.  What other examples do you have  
24   of -- strike that.

25                    You said your asthma was common

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1 knowledge at Tri Star, correct?

2 A. I mean, I feel like it is -- like I  
3 said, it's not something I had, so I feel like it  
4 would have easily come up in conversations or, you  
5 know, throughout the years.

6 Q. Can you remember any specific times it  
7 came up?

8 A. Besides 2020?

9 Q. Yes.

10 A. Probably -- probably at different times  
11 when I was sick and -- because -- sorry. Whenever  
12 I'm like -- whenever I've been sick, the asthma  
13 will exacerbate some of the symptoms and stuff.  
14 So, you know, times like that, we would have  
15 talked about it.

16 Q. Who would have talked about it?

17 A. Like, me and my team or Bryan or  
18 coworkers. I don't know. But I'm just -- I don't  
19 know.

20 Q. Can you think of any specific times  
21 other than March 2020?

22 A. Yeah, I -- there would have been a  
23 conversation about the -- about the heaters and it  
24 being too cold where I was working down at the --  
25 down by the reception area.

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1 deciding where I'm at as far as symptom severity,  
2 because I know when I get to, like, a certain  
3 point, if I don't use my rescue inhaler, then I'm  
4 in trouble.

5 Q. Okay. If you use your rescue inhaler  
6 when you feel the symptoms coming on, does that  
7 get everything back under control?

8 A. So the rescue inhaler, it just opens the  
9 bronchial tubes. It doesn't, like, relieve the  
10 other symptoms as far as, like, the coughing and  
11 stuff. It just opens the bronchial tubes so you  
12 can get air.

13 But the other part of that is that you  
14 have this overproduction of mucus, and so you  
15 continue to cough, because you have to work that  
16 mucus out. So the coughs will last for a few days  
17 after the event.

18 Q. Okay. Are you able to function with a  
19 cough?

20 A. Uh-huh (affirmative response); yes.

21 Q. Okay. And you mentioned triggers  
22 earlier, and you talked about wind in your face  
23 and it being cold. What are the other triggers  
24 for your asthma?

25 A. So, like, synthetic fog is one of -- is,

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1 then you said your first symptom of asthma issues  
2 is a cough, correct?

3 A. Uh-huh (affirmative response).

4 Q. And then your airway gets tight,  
5 correct?

6 A. Yeah. Well, the -- like, the area  
7 around the chest starts to get tight. Like, this  
8 whole area (indicating) would get tight before the  
9 bronchial tubes closed.

10 Q. Okay. So you cough first, and then your  
11 chest gets tight?

12 A. Yeah. And then, like, I would start  
13 breathing -- like wheezing and breathing, like,  
14 with my stomach. And if I start breathing with my  
15 stomach, then I'm in a spot that is, like, you may  
16 or may not be in trouble. Like, I should have --  
17 by the time I start breathing with my stomach, I  
18 should have that rescue inhaler, like, in my hand.

19 Q. Okay. Have you ever had an asthma  
20 attack?

21 A. Yes.

22 Q. All right. When?

23 A. Well, every time that I, like, have any  
24 sort of an event, that is technically classified  
25 as, like, an attack.

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1 I am -- like, I tend to only use the  
2 word "attack" when I end up, like, the hospital or  
3 having, like, a really bad reaction to it  
4 afterwards. But technically, if we're talking  
5 about attacks, anytime that I have to use that  
6 rescue inhaler is an attack.

7 Q. So how often in a week do you use your  
8 rescue inhaler?

9 A. It would depend on what I'm doing, and  
10 it would depend on the season and if there's any  
11 triggers around. So, like, in the wintertime, I  
12 tend not to use it more than I do in, like, the  
13 summer or fall. But pretty much anytime I am  
14 going to exercise, I'm going to do a proactive use  
15 of the rescue inhaler, and then if I have  
16 additional complications while exercising, I would  
17 use it again.

18 So it could be, you know, once a week or  
19 twice a week, or it could be four times a week.  
20 It just -- it depends.

21 Q. Okay. And have you ever been  
22 hospitalized for an asthma attack?

23 A. Not overnight.

24 Q. Not overnight. Okay.

25 Have you ever been -- gone to the



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1                   And then at some point in that illness,  
2   it just got so bad that I couldn't breathe, and  
3   the rescue inhaler wasn't doing anything, so I had  
4   to go to the emergency room, and that's why I had  
5   to use the albuterol because the -- the breathing  
6   treatments, the nebulizers that they use, they  
7   always use albuterol there, and so I just had to  
8   deal with the vomiting. I knew what was coming.

9           Q.    You knew you were allergic to albuterol  
10   in 2010?

11          A.    Yeah. But when you're -- you know, when  
12   your Xopenex isn't working and you can't breathe  
13   and you're desperate, that's what you have to do.

14          Q.    When did you first get a rescue inhaler?

15          A.    When I was diagnosed.

16          Q.    Okay. What other medications do you  
17   take for your asthma?

18          A.    Currently, I take Singulair, I take  
19   Flonase, and I take Zyrtec. So to manage the  
20   allergies means that I can manage the asthma  
21   better.

22          Q.    Okay. So Zyrtec is for your allergies,  
23   correct?

24          A.    Uh-huh (affirmative response).

25          Q.    What about Flonase?

Christie Andrews 8/23/2022

1           A.    Flonase is also for the allergies, yeah.  
2           Q.    What about Singulair?  
3           A.    Singulair is for allergies and asthma.  
4           Q.    Is that all the medications you're  
5   taking for your asthma?  
6           A.    Currently, yes.  
7           Q.    Were you taking these same medications  
8   in 2020 for your asthma?  
9           A.    Yes; uh-huh (affirmative response).  
10          Q.    Do you feel like your asthma is under  
11   control today?  
12          A.    Yes.  
13          Q.    How often do you take the Singulair?  
14          A.    Every day.  
15          Q.    Once a day?  
16          A.    Yes.  
17          Q.    Flonase?  
18          A.    Once a day.  
19          Q.    Zyrtec?  
20          A.    Once a day.  
21          Q.    Do you carry your Xopenex with you all  
22   the time?  
23          A.    Yes. Do you need it?  
24          Q.    No.  
25          A.    Okay.

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1 Q. I believe you.

2 Where do you keep it? Like, right now,  
3 where is it?

4 A. So I always have, like, a bunch of them  
5 around the house and stuff. So one is in my  
6 purse. There's usually one in my backpack,  
7 there's one in my nightstand, and there's usually  
8 one, like, in all the pockets of my, like, coats  
9 and stuff. So just -- they're everywhere.

10 Q. Okay. The Xopenex is prescription,  
11 correct?

12 A. Yes.

13 Q. What about the Singulair?

14 A. Yes.

15 Q. Flonase?

16 A. Yes.

17 Q. You have a prescription for Flonase?

18 A. Uh-huh (affirmative response). Yes.

19 Q. Okay. What about -- and Zyrtec?

20 A. Yes, but I actually prefer the  
21 over-the-counter version of the Zyrtec because it  
22 comes in the dissolve -- the quick dissolve. So I  
23 usually use the over-the-counter version of Zyrtec  
24 instead of the prescription.

25 Q. Okay.

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1           A.    But it's the same strength, is what I've  
2    been told.

3           Q.    Okay.  Do you feel like with your --  
4    having your Xopenex kind of everywhere and  
5    available to you, that your asthma is under  
6    control?

7           A.    Well, the Xopenex, that's for the --  
8    that's the rescue inhaler, so I've -- with the  
9    steps I take with using me -- you know, taking my  
10   Singular and all that stuff, and then also making  
11   sure that I do use the Xopenex before I exercise,  
12   that's what keeps it under control.

13          Q.    Okay.

14          A.    If I wasn't taking everything, then, no,  
15   it wouldn't be well controlled.

16          Q.    Okay.  But with the Singular, Flonase,  
17   Zyrtec, and Xopenex, your asthma is well  
18   controlled?

19          A.    Uh-huh (affirmative response).

20                MR. ARCINIEGAS:  You have to say "yes"  
21                or "no."

22                THE WITNESS:  Oh, I'm sorry.  Yes.

23          Q.    (By Ms. Hart)  We talked about going to  
24   the hospital for asthma attacks.  Have you ever  
25   gone to urgent care for an asthma attack?

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1           A.    Is urgent care the same as the emergency  
2    room or...

3           Q.    Well, when I say "urgent care," I mean  
4    like a -- not the emergency room, but the next  
5    level down.

6           A.    Oh, like a walk-in clinic?

7           Q.    Yeah.

8           A.    I wouldn't typically, but I did in 2020  
9    during the pandemic.

10          Q.    Okay. Tell me about that.

11          A.    So the -- that was when we were still  
12    kind of concerned about the use of steroids and it  
13    causing your symptoms to be worse if you had  
14    COVID, and -- because I was having this asthma  
15    attack and the cough was not going away in what I  
16    felt to be, like, a normal time, within, like, a  
17    few days, I went to the doctor because I thought I  
18    needed, like -- or telehealth with the doctor  
19    because I felt like I needed maybe prednisone or  
20    something because that's what we would normally do  
21    in this case.

22                And she wanted to make sure that, like,  
23    we were absolutely positive that it wasn't COVID,  
24    and because she couldn't see me, like, in person,  
25    she couldn't be sure, so -- but her hospital at

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1 the time did not have access to testing, but she  
2 knew Vanderbilt did. So she told me to go to  
3 Vanderbilt and get a test there. So I called  
4 them, and they said they'd be willing to test me,  
5 so I went in there.

6 Q. And when you say "she," who are you  
7 talking about?

8 A. Nelson. Sorry.

9 Q. Which Vanderbilt clinic did you go to?

10 A. The one in -- I believe that it's  
11 Bellevue where -- next to the Kroger on 70. I  
12 believe that's still Bellevue, right? Or I don't  
13 know, but I believe it's Bellevue.

14 Q. Okay. When you went to Vanderbilt, when  
15 was that?

16 A. I believe that was March 20th.

17 Q. Of 2020?

18 A. Yes.

19 Q. Okay. And did you just go for the COVID  
20 test?

21 A. She also wanted them to listen to my  
22 lungs and make sure that I didn't have any type  
23 of -- like, anything leading to bronchitis or  
24 something of that nature.

25 Q. And did they do that?

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1           A.    Yes.

2           Q.    Do you have any medical restrictions  
3   because of your asthma?

4                   MR. ARCINIEGAS:  Object to form, vague.

5                   THE WITNESS:  Besides the albuterol  
6   allergy?

7           Q.    (By Ms. Hart)  Uh-huh (affirmative  
8   response).

9                   Was there anything your treating -- your  
10   practitioner has told you you can't do because of  
11   your asthma?

12                   MR. ARCINIEGAS:  Object to form, vague.

13                   THE WITNESS:  Not that I can't do.  I  
14   mean, we -- when I'm thinking of doing  
15   something new or thinking of doing something,  
16   like, extra strenuous or something like that,  
17   we -- I would check in with her, and we would  
18   come up with, like, a plan of action and  
19   whatever.

20                   Like, case in point, when I went to  
21   Alaska, I knew every medical precaution I  
22   would need to take if I had an episode while  
23   in Alaska.

24                   So I would check in with her on things  
25   like that.  But I don't like to think that

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1           there's things I can't do.

2           Q.    (By Ms. Hart)   Okay.   So do you perceive  
3   yourself as disabled because of your asthma?

4           MR. ARCINIEGAS:   Object to form.

5           THE WITNESS:   I perceive myself as  
6   someone who has to deal with this every day  
7   and try not to let it get in my way.

8           Q.    (By Ms. Hart)   Do you perceive yourself  
9   as disabled because of your asthma?

10          MR. ARCINIEGAS:   Same objection.

11          THE WITNESS:   I mean, I guess, yes.   I'm  
12   not, like, handicapped.   I don't need a  
13   handicapped placard, but, yeah, I mean, it's  
14   debilitating sometimes.

15          Q.    (By Ms. Hart)   All right.   You said  
16   "it's debilitating some times," right?

17          A.    (Witness nods head affirmatively.)

18          Q.    Okay.   How is it debilitating?

19          A.    Well, for instance, after I have an  
20   attack, if I don't get over it within a few days,  
21   I can end up with bronchitis or pneumonia, and  
22   then it does get in the way of my day to day.   I  
23   end up -- I'm sick and, you know, I can't do  
24   anything.   I can't move around a lot.

25          Q.    What do you mean you can't move around?



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1           A.    If he was -- if she was up in my face,  
2    it would be, yeah.

3           Q.    Okay.

4           A.    Or if I was living, like, in her dander.  
5    Like, if she was on the couch and then I was on  
6    the couch, yeah, it would be a problem.

7           Q.    But right now, she's probably, what do  
8    you say, probably 10, 15 feet away in the crate  
9    not bothering you?

10          A.    Yeah. And it's more like the ones that  
11   have, like, the down -- the down-type coats that  
12   are the problem, too; for instance, like a German  
13   Shepherd.

14          Q.    Are there other things you would do but  
15   you don't do because of your asthma?

16          A.    I'm sure there are, but I can't think of  
17   them right now.

18          Q.    Okay.

19          A.    Sorry.

20          Q.    All right. And you also said, "There  
21   are things I can't do because of my asthma."

22                What can you not do because of your  
23   asthma?

24          A.    I can't be in cold weather for, like,  
25   long periods of time. That's a problem.

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1 episode; is that fair?

2 A. Yes.

3 Q. So an episode where you maybe have to  
4 use your inhaler?

5 A. Yes.

6 Q. Did you ever have an asthma attack like  
7 that at Tri Star, at the office?

8 A. Yes. On March 16th of 2020, I had an  
9 episode where I had to use my rescue inhaler.

10 Q. Tell me about that. And we'll get into  
11 March 2020, but do tell me about that.

12 A. It was just an instance of someone was  
13 using, like, the Lysol spray, and it was -- it was  
14 kind of just hanging in the air for a bit, and it  
15 caught me in, like, a way that triggered, and so I  
16 started coughing, and I was trying to do all the  
17 things I normally do to keep myself under control  
18 and to regulate the breathing and whatnot, and it  
19 wasn't quite working. So I -- when I felt, like,  
20 the tightness in my chest had reached a certain  
21 point, I went to the restroom, and I used my  
22 inhaler.

23 Q. And did that help?

24 A. It helped with the breathing, itself,  
25 but the cough is -- is still going to remain.

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1 Q. Okay. And so did you see either Amanda  
2 or Miles spraying Lysol?

3 A. Uh-huh (affirmative response). Yeah, it  
4 was -- I want to say it was Amanda. I mean,  
5 everyone was spraying it all day, so I saw people  
6 spraying it throughout the day. It was just this  
7 particular instance where the liquid droplets were  
8 still, like, hanging in the air kind of the --  
9 because that's -- that's, like, really  
10 concentrated, right? So it -- that was what  
11 caused the problem. And I want to say it was  
12 Amanda because she was sitting across from me, and  
13 I feel like that's what I remember. But it's kind  
14 of hard for me to remember always because the --  
15 like I said, there's, like, an adrenaline dump  
16 that happens there, and it kind of makes you --  
17 when you have, like, all that adrenaline, you tend  
18 to black out a little bit, and that, like --  
19 because you're thinking about, I need to breathe  
20 type situation.

21 Q. Do you remember what time of day that  
22 was?

23 A. It was sometime in the middle of the  
24 day, like, maybe after, like, lunchtime-ish.

25 Q. Were you cleaning your area --

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1 A. Yes.

2 Q. -- that day?

3 A. Uh-huh (affirmative response).

4 Q. What did you use to clean?

5 A. I believe I used, like, a Clorox wipe or  
6 some sort of wipe. That's typically what I would  
7 gravitate towards.

8 Q. And the wipes don't bother your asthma?

9 A. No. I mean, sometimes if I was to,  
10 like, do it in a closed environment, that would be  
11 a problem. But, like, in a -- like, if I were to  
12 use it in my car, yeah, because that's, like, a  
13 really tight space. But if it's just here  
14 (indicating), like, this wouldn't be so much of a  
15 problem unless I put the thing, like, up to my  
16 face and smelled it type.

17 Q. Did anyone see you coughing and using --  
18 having to use your inhaler that day?

19 A. Bryan kept bringing up the cough,  
20 because he kept saying, "Are you sure you don't  
21 have COVID?" And I kept saying, "No, I don't have  
22 COVID."

23 They wouldn't have seen me using my  
24 inhaler. I tended to do that in the bathroom,  
25 because I have to, like, rinse my mouth out

Christie Andrews 8/23/2022

1 see you coughing?

2 A. My deskmates would have seen me  
3 coughing.

4 Q. And that's Miles and Amanda?

5 A. And Kristen Mir, yes. Amanda Portillo.  
6 Miles -- I can't remember Miles' last name, sorry.

7 Q. That's okay.

8 A. And Kristen Mir.

9 Q. Okay. Did you tell anybody you were  
10 going to use the inhaler before you did it?

11 A. I don't recall. Sorry, I don't know.

12 Q. Okay. And what about after you used the  
13 inhaler? Did you talk to anybody about using the  
14 inhaler after you did it?

15 A. I don't remember.

16 Q. Okay. Sort of the same question, but  
17 did you talk to anybody about having breathing  
18 problems on March 16th?

19 A. Yes; yes.

20 Q. Who did you talk to?

21 A. Well, I talked to Bryan about it because  
22 he kept saying it was COVID, and I kept saying,  
23 "No, it's just asthma," because of the Lysol,  
24 like, it's just a cough from asthma.

25 Q. After you used the inhaler, then did you

Christie Andrews 8/23/2022

1 repeat the question? I didn't hear you.

2 Q. (By Ms. Hart) Yeah. Have we talked  
3 about all the times you've talked to Tri Star  
4 employees about your asthma?

5 A. That I can remember.

6 Q. Okay. And Autumn Nelson's name has come  
7 up a few times.

8 A. Yes.

9 Q. Is she your main medical provider?

10 A. Yes.

11 Q. And you see her regularly?

12 A. Yes.

13 Q. How often do you see her?

14 A. I have to see her every three months,  
15 because she also does my ADHD prescription  
16 refills.

17 Q. Okay. And do you see her for anything  
18 else regularly?

19 A. You mean, like -- could you explain?  
20 Sorry.

21 Q. Sure.

22 So you see her regularly. You have to  
23 go see her every three months because of your  
24 ADHD, correct?

25 A. Yes.

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1 Q. Is there any other reason why you have  
2 to go see her regularly?

3 A. I mean, she does all my physicals and  
4 stuff, and she does -- she monitors my asthma, and  
5 she monitors my iron levels and different things  
6 like that. So I mean, I see her regularly for all  
7 of the things.

8 Q. Okay. And when you were living in  
9 California, who was your main medical provider?

10 A. Dr. Stein.

11 Q. Did you see anybody else in California?

12 A. Not regularly.

13 Q. Okay.

14 A. As far as a physician goes.

15 Q. And then what about in Tennessee, do you  
16 see anybody else regularly?

17 A. Not currently, no.

18 Q. Have you ever?

19 A. I was going to a sleep doctor here in  
20 Tennessee for a while.

21 Q. Who was that?

22 A. Well, I was going to the Sleep Centers  
23 of Middle Tennessee. Their doctors kept changing.

24 Q. Okay. When was the last time you were  
25 there, do you know?

Christie Andrews 8/23/2022

1 Q. And I think you said earlier -- correct  
2 me if I'm wrong -- but I think you said earlier  
3 that you thought your asthma was a big risk for  
4 COVID based on information you heard from the CDC  
5 and the media; is that correct?

6 A. Uh-huh (affirmative response).

7 Q. You --

8 A. Yes. Sorry.

9 Q. Were you getting on the CDC's website?  
10 How were you getting this information?

11 A. I was mostly watching, like, the news in  
12 the morning, and I tend to watch Good Morning  
13 America, so there was that doctor with the blond  
14 hair that's always on Good Morning America  
15 talking. She was kind of giving people the CDC  
16 update.

17 Q. Okay. So Good Morning America was kind  
18 of your main source of information; is that fair  
19 to say?

20 A. Yeah, in the mornings, yes. Or News  
21 Channel 5, the local one. I like them.

22 Q. How long did you want to work from home?

23 A. Could you rephrase?

24 Q. Sure.

25 So you requested to work from home --



Christie Andrews 8/23/2022

1 Are you familiar with this document?

2 MR. ARCINIEGAS: Object to form, lack of  
3 foundation.

4 THE WITNESS: I'm not sure. I'd have to  
5 read it.

6 Q. (By Ms. Hart) You can take all the time  
7 you want.

8 A. (Examining.)

9 Okay.

10 Q. Okay. So you just took time to read the  
11 policy that's marked "Disability Accommodation."

12 Have you seen this document before?

13 A. I couldn't be sure. It looks like it  
14 would have come from, like, a policy and procedure  
15 or an employee handbook, but there's no date on  
16 it, so I don't know when this is from.

17 Q. Sure. Okay.

18 In March 2020, were you familiar with  
19 Tri Star's Disability Accommodation policy?

20 MR. ARCINIEGAS: Object to form, vague.

21 THE WITNESS: Only in the respects that  
22 I had talked to Yolanda about it.

23 Q. (By Ms. Hart) What do you mean?

24 A. When I had asked her about working from  
25 home, and the -- the conversation that we had had.

Christie Andrews 8/23/2022

1 That's the only time that I was familiar with the  
2 disability accommodation.

3 Q. Okay. Who did you talk to first when  
4 you requested to work from home? Who at Tri Star  
5 did you talk to first?

6 A. I believe either Bryan or Yolanda.

7 Q. Were those verbal conversations?

8 Let's start with Bryan.

9 A. I can't be sure. I know that we -- that  
10 we talked in person and over e-mails regarding it  
11 that day, but I don't remember the order of which  
12 everything happened or if it was -- I can't  
13 remember if it was in person or if it was over  
14 e-mail or how it was.

15 Q. Okay. And we'll go through some of the  
16 e-mails.

17 Did you talk to Bryan in person about  
18 the possibility of you working from home?

19 A. Yes. At some point during the day, yes.

20 Q. Tell me about that conversation.

21 A. I -- I don't remember, like, the  
22 specifics of it. I just -- I know that we were  
23 near that area of where Team 2 sits, and we kind  
24 of all were talking about it as a group. And then  
25 I had told him that I needed to request and that

Christie Andrews 8/23/2022

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7 you want.

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11 policy that's marked "Disability Accommodation."

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14 would have come from, like, a policy and procedure  
15 or an employee handbook, but there's no date on  
16 it, so I don't know when this is from.

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19 Tri Star's Disability Accommodation policy?

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Christie Andrews 8/23/2022

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10 we talked in person and over e-mails regarding it  
11 that day, but I don't remember the order of which  
12 everything happened or if it was -- I can't  
13 remember if it was in person or if it was over  
14 e-mail or how it was.

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16 e-mails.

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18 the possibility of you working from home?

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20 Q. Tell me about that conversation.

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22 specifics of it. I just -- I know that we were  
23 near that area of where Team 2 sits, and we kind  
24 of all were talking about it as a group. And then  
25 I had told him that I needed to request and that

Christie Andrews 8/23/2022

1 March 16th, 2020.

2 And then you, essentially, forward this  
3 e-mail to Bryan Luecke and Yolanda, correct?

4 A. Yes.

5 Q. On March 16 at 4:27 p.m.

6 A. Uh-huh (affirmative response).

7 Q. Do you --

8 MR. ARCINIEGAS: I'm sorry, can you all  
9 orient me? Where are we, what page?

10 MS. HART: 142.

11 MR. ARCINIEGAS: Sorry. Thank you.

12 MS. HART: Very bottom.

13 Q. (By Ms. Hart) And you say, "Since I  
14 already have a company laptop and a doctor who's  
15 pissed at me and called me irresponsible for not  
16 staying home, may I please be approved to work  
17 from home?"

18 Do you remember writing that?

19 A. I don't remember the, like -- I don't  
20 recall writing it, but I know that I did write it.

21 Q. Okay. This is your e-mail?

22 A. Yes; yes.

23 Q. Okay. What doctor are you talking  
24 about?

25 A. My best friend, Emily.

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1 to you?

2 A. Yes; yes.

3 Q. And then Bryan responds -- if you keep  
4 going up on page 2, 142, and then Yolanda responds  
5 to you. Do you see that, March 16th at 4:48 p.m.?

6 A. Yes.

7 Q. Okay. And she says, "Hi, Christie,  
8 unfortunately, you cannot take any other equipment  
9 with you to work from home other than your laptop.  
10 Let me speak with Bryan, and I'll follow up with  
11 you by tomorrow."

12 A. Uh-huh (affirmative response).

13 Q. And then you respond at the very bottom  
14 of page 1, 141, and you say, "So don't work from  
15 home tomorrow?"

16 And Yolanda responds, and then the last  
17 e-mail, which is the first on the chain,  
18 March 16th, 2020, at 5:00 p.m., you say, "I'll be  
19 here. I just wanted to make sure that's what you  
20 meant." Correct?

21 A. Yes.

22 Q. So at 5:00 p.m. on March 16th, you're  
23 planning to come into the office --

24 A. Yes.

25 Q. -- the next day.

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1 A. Yes.

2 Q. Correct?

3 Let me finish my question.

4 A. Oh, I'm sorry.

5 Q. That's okay. It's easy to do.

6 So on March 16th, 5:00 p.m., you're  
7 planning to come in on Tuesday, March 17th,  
8 correct?

9 A. Correct.

10 MS. HART: We're going to mark this one  
11 Exhibit 14.

12 (Exhibit 14 marked for identification.)

13 MS. HART: And we just marked  
14 Exhibit 14, Plaintiff's production 18, and  
15 this one is not marked confidential, but it  
16 does -- it does name an employee with a  
17 health concern, so we may want to designate  
18 it as confidential. It names Miles there in  
19 the middle.

20 Q. (By Ms. Hart) This document is from  
21 Bryan Luecke, March 17th, 2020, which is Tuesday,  
22 10:00 o'clock in the morning, and Bryan e-mails  
23 Yolanda, Heather, and Peggy, and copies you, and  
24 says, "I have told Christie to take a sick day and  
25 stay home today."

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1 quit. I was fired after I was instructed by  
2 management (please reference our previous e-mail  
3 chain) not to come into the office because I was  
4 coughing so bad and everyone was worried I was  
5 going to get them sick."

6 Correct?

7 A. Yes.

8 Q. Did you write that?

9 A. Yes, I did.

10 Q. I'm going to start a -- do you want to  
11 take a break?

12 A. Oh, yeah, that would be great.

13 VIDEOGRAPHER: Time is 2:13. We are off  
14 the record.

15 (A short break was taken.)

16 VIDEOGRAPHER: Time is 2:20. We are  
17 back on record.

18 Q. (By Ms. Hart) Ms. Andrews, after you  
19 sent the e-mail requesting to work from home  
20 saying your doctor is pissed at you, what happened  
21 after that?

22 A. Well, I believe I said "a doctor is  
23 pissed at me," not my doctor.

24 But I continued to follow up with  
25 Yolanda, because I didn't -- I think what I



Christie Andrews 8/23/2022

1 Q. Okay.

2 MS. HART: And we'll make that  
3 Exhibit 16.

4 (Exhibit 16 marked for identification.)

5 MS. HART: I wrote on it. I don't have  
6 a copy of this one, I'm sorry.

7 MR. ARCINIEGAS: That's fine. Just the  
8 Bates number, please.

9 MS. HART: Plaintiff's production 16,  
10 actually.

11 MR. ARCINIEGAS: Nice.

12 Q. (By Ms. Hart) I've just handed you what  
13 we've marked as Exhibit 16, Plaintiff's  
14 production 16. And this is a note from Tri Star  
15 Medical Group.

16 Do you recognize this?

17 A. Yes.

18 Q. Okay. What is this?

19 A. This is the doctor's note that I  
20 provided to Yolanda.

21 Q. How did you get it to Yolanda?

22 A. I sent it to her via e-mail.

23 "Per our previous phone call, please  
24 find attached..."

25 Q. Okay. So this note is dated March 17,

Christie Andrews 8/23/2022

1 2020.

2 A. Yes.

3 Q. From Autumn Nelson, and it says,  
4 "Christie Andrews has been a patient at our office  
5 for several years. She has known asthma.  
6 Although well controlled, she would benefit from  
7 working at home due to the rising risk of  
8 COVID-19."

9 You agree it says that?

10 A. Yes.

11 Q. Do you agree with Ms. Nelson that your  
12 asthma was well controlled?

13 A. Yes, because of my medication, it is  
14 well controlled.

15 Q. Okay.

16 A. That's what -- in "asthma speak" what  
17 "well controlled" means is that I do what I'm  
18 supposed to do, and "not controlled" would be that  
19 I don't take my medicine and I don't do all the  
20 necessary precautions.

21 Q. Is this the only note from a medical  
22 provider that you provided to Tri Star for your  
23 asthma and work-from-home request?

24 MR. ARCINIEGAS: Object to form.

25 MS. HART: That's a bad question.

Christie Andrews 8/23/2022

1 MR. ARCINIEGAS: A little vague, but go  
2 ahead.

3 Q. (By Ms. Hart) Did you provide any other  
4 documentation to Tri Star to support your  
5 work-from-home request?

6 A. I don't recall. I think -- I believe it  
7 was just this.

8 Q. Okay. Do you recall that you had been  
9 out of work on Thursday, March 12th, and Friday,  
10 March 13th?

11 A. I recall going to the funeral that  
12 weekend, but I thought that I had taken a day off  
13 or a half day or left after work to go to Alabama.

14 Q. Okay. March 16, 2020, was your last day  
15 in the office, correct?

16 A. Correct.

17 Q. And then you were laid off on  
18 March 20th, 2020, correct?

19 A. Yes.

20 Q. Who told you that you were being laid  
21 off?

22 A. Yolanda Simpson.

23 Q. How did she tell you?

24 A. Over the phone.

25 Q. Was anyone else on the phone?

Christie Andrews 8/23/2022

1 A. Bryan.

2 Q. What did Yolanda say?

3 A. She said I was being let go due to lack  
4 of work.

5 Q. What else did she say?

6 A. I don't remember. I -- I had a coughing  
7 fit during it, because the, like -- I was just in  
8 shock and stressed, and so I was coughing a lot,  
9 so I don't remember everything that was said. But  
10 there wasn't much. It was a quick phone call.

11 Q. What did Bryan say on the phone call?

12 A. Nothing. He just said that he was --  
13 she said, "This is Yolanda with Bryan," and he  
14 said, "Hello." So I knew he was there and in the  
15 room.

16 Q. So what did you say?

17 A. I said -- I said, "Yolanda, I know you  
18 haven't been here very long, and you might not  
19 know this, but there's no way that I have a lack  
20 of work. I have plenty of work to do," and that I  
21 couldn't believe after giving Tri Star, like, six  
22 years of my life, that they would do this to me.

23 Q. What else did you say?

24 A. That's what I remember saying. I  
25 don't -- I'm sure there was other things, but I

Christie Andrews 8/23/2022

1 Q. (By Ms. Hart) Do you know what that  
2 means, to be an "at-will employee"?

3 A. No.

4 Q. Do you know how many employees Tri Star  
5 had in March 2020 immediately prior to you being  
6 laid off?

7 A. I believe it was over a hundred between  
8 the two offices.

9 Q. Do you know how many employees were laid  
10 off the same day you were laid off?

11 A. No.

12 Q. Do you understand that other employees  
13 were laid off during that time frame?

14 A. No.

15 Q. Sitting here today, do you understand  
16 that more employees were laid off, or do you  
17 believe you were the only person terminated?

18 MR. ARCINIEGAS: Object to form,  
19 compound.

20 THE WITNESS: I don't think that I know  
21 that anyone else was laid off. I don't...

22 Q. (By Ms. Hart) Sitting here today, do  
23 you believe you were the only --

24 A. Yes, I believe --

25 Q. Let me get my question out.

Christie Andrews 8/23/2022

1     that live events are a big part of Tri Star's  
2     revenue?

3                 MR. ARCINIEGAS: Object to form, lack of  
4     foundation.

5                 You can answer.

6                 THE WITNESS: I think they are a part of  
7     their revenue but not all of their revenue or  
8     a majority of their revenue. I couldn't tell  
9     you because I don't do corporate.

10                Q.     (By Ms. Hart) Would you agree with me  
11     that lots of live events were canceled in  
12     March 2020?

13                MR. ARCINIEGAS: Object to form, calls  
14     for speculation, lack of foundation.

15                THE WITNESS: At the time of me getting  
16     fired, I did not know if that was true or  
17     not.

18                Q.     (By Ms. Hart) Right now, sitting here  
19     today, would you agree with me --

20                A.     Yes.

21                Q.     Let me finish my question.

22                A.     I'm sorry.

23                Q.     -- lots of live events were canceled in  
24     March 2020?

25                MR. ARCINIEGAS: Same objection.

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1           THE WITNESS:   Either March or April.   I  
2           can definitely say yes to April.   I can't  
3           recall, like, March, because I was sick for a  
4           lot of March.   Or I should say post  
5           March 20th.

6           Q.    (By Ms. Hart)   And you may have already  
7           answered this, but do you have any knowledge of  
8           whether Tri Star lost revenue in March and April  
9           of 2020?

10          A.    I do not.

11          Q.    Do you believe you were replaced?

12          A.    Yes.

13          Q.    By who?

14          A.    I don't know the person's name, but I  
15          believe they hired someone about a month or so, or  
16          maybe more, after -- it takes a while -- the  
17          hiring process at Tri Star takes a while, so it  
18          could have been more than a month or so, but I  
19          believe that they hired someone to replace me,  
20          yes.

21          Q.    What is that belief based on?

22          A.    I guess I was told, and because I saw  
23          the posting.   I think I was told.

24          Q.    Told by who?

25          A.    I don't remember.   Someone who was still

Christie Andrews 8/23/2022

1 working there.

2 Q. When did they tell you that?

3 A. I can't remember when it was. I just  
4 remember knowing that I -- someone had come in --  
5 I think they brought them in, like, as a  
6 receptionist first and then put them in the team  
7 coordinator position or something to that effect.

8 Q. Where would you get that knowledge?

9 A. From -- from someone who was still  
10 working there.

11 Q. Who?

12 A. I -- I don't remember, but I believe it  
13 was after my conversation with the EEOC that I  
14 found out about it.

15 Q. When you say "conversation with the  
16 EEOC," what do you mean?

17 A. When I had my interview with them in  
18 October.

19 Q. Of 2020?

20 A. Yes.

21 Q. Okay. So you believe you were replaced,  
22 but you don't know who replaced you or when?

23 A. Yeah.

24 Q. Did you get COBRA coverage when you were  
25 laid off?



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1           A.    Yes.

2           Q.    How long did you have that?

3           A.    I had that, I believe, into 2021. I

4    can't be sure of the exact date that it was over.

5           Q.    Did you apply for TennCare?

6           A.    What is TennCare?

7           Q.    Government benefits.

8           A.    The, like, unemployment?

9           Q.    Government healthcare benefits.

10          A.    No.

11          Q.    Did you travel to Florida after you got

12   laid off?

13          A.    Yes.

14          Q.    Okay. When did you do that?

15          A.    It was, like, the last couple of days of

16   March, I believe. I went and stayed with my

17   parents.

18          Q.    Okay. I know nobody wants bathing suit

19   pictures in a deposition, but here we are.

20          A.    So fun.

21                MS. HART: I'm going to mark this as

22   Exhibit 17. Collective exhibit, please.

23                (Exhibit 17 marked for identification.)

24                THE WITNESS: Thank you.

25          Q.    (By Ms. Hart) All right. I've just

Christie Andrews 8/23/2022

1 handed you three pictures from an Instagram  
2 account. They're screenshots.  
3 Do you recognize these pictures?  
4 A. Yes, I do.  
5 Q. What do they depict?  
6 A. This was a girls' weekend in eastern --  
7 or I guess it's still middle Tennessee. It's  
8 like -- there's a lake over there.  
9 Q. Center Hill?  
10 A. Center Hill?  
11 Q. Center Hill Lake?  
12 A. Yeah, that sounds right.  
13 Q. When was this?  
14 A. September 2020.  
15 Q. Okay. So the date on the photo?  
16 A. No.  
17 Q. And tell me, look at this first picture.  
18 Is this your Instagram account, Christie Andrews?  
19 A. Yes.  
20 Q. Who is in this first picture of you guys  
21 in the lake?  
22 A. That is Erin Preyer, Kendall Coppage,  
23 Elise --  
24 MR. ARCINIEGAS: For me.  
25 THE WITNESS: Oh, I'm sorry.

Christie Andrews 8/23/2022

1                   And do you recognize this as Dr. Stein's  
2     handwriting?

3           A.     I recognize that it is illegible  
4     handwriting, yes. I couldn't tell you that it's  
5     his, but it's very illegible.

6           Q.     Okay. What I interpret this to say  
7     is -- in the first chunk of handwriting here is,  
8     "Asthma. Does not need inhaler since last visit,"  
9     or, "Did not need inhaler since last visit."

10                  Would you agree it says that?

11          A.     I agree it says that. I think he's  
12     saying I don't need a refill.

13          Q.     Okay.

14                  MS. HART: All right. We'll mark this  
15     one as 23.

16                  (Exhibit 23 marked for identification.)

17                  THE WITNESS: Thank you.

18          Q.     (By Ms. Hart) Another record from  
19     Dr. Stein. The Bates number is Third-Party  
20     Records 120. It's dated May 9th, 2016.

21                  And he writes, "Asthma," in his doctor  
22     handwriting here (indicating), and checks the box  
23     "Controlled, well."

24                  Do you see that?

25          A.     Yes.

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1 "Asthma," he checks the "Well-controlled" box and  
2 writes, "Doing well."

3 Do you agree with that?

4 A. Yes.

5 Q. And then it looks to me like it says  
6 "uses" or "used Xopenex with strenuous exercise  
7 only."

8 Would you agree it says that?

9 A. Yes.

10 Q. So on August 23rd, 2016, your asthma is  
11 well controlled, yes?

12 A. August is not normally a bad month for  
13 me.

14 Q. Okay.

15 A. No, this is a new one. Sorry.

16 MS. HART: Can't keep track now.

17 Number 26.

18 (Exhibit 26 marked for identification.)

19 THE WITNESS: Thank you.

20 Q. (By Ms. Hart) Number 26 is another one  
21 of Dr. Stein's records, November 17, 2016. And in  
22 the top right grid, at the bottom of the grid, he  
23 writes, "Asthma, doing well."

24 You agree?

25 A. Yes.

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1 Q. It does show a box "Well controlled"  
2 next to "Asthma."

3 Do you see that?

4 A. Yes. My asthma is well controlled.

5 Q. Is well controlled. Okay.

6 MR. ARCINIEGAS: Do you mind if we take  
7 a break?

8 MS. HART: Sure.

9 VIDEOGRAPHER: Time is 2:58. We are off  
10 the record.

11 (A short break was taken.)

12 VIDEOGRAPHER: This is the beginning of  
13 case file number 6. Time is 3:16. We are  
14 back on record.

15 Q. (By Ms. Hart) All right. Ms. Andrews,  
16 we're almost done going through these medical  
17 records. I know it's tedious.

18 Has there been a time since you moved to  
19 Nashville that you would describe your asthma as not  
20 well controlled?

21 A. Not -- not so much as not well  
22 controlled. I just felt like it was not doing --  
23 I didn't feel like the medication that I was on  
24 was working the way I needed it to anymore, and  
25 that's when we made the switch to the Singulair.

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1 Q. When was that?

2 A. I believe that was toward the beginning  
3 of 2020.

4 Q. And when you started taking Singulair,  
5 would you say your asthma was under control?

6 A. Yeah, I saw a lot of improvement from  
7 the QVAR to the Singulair. Yeah.

8 MS. HART: We're going to mark this  
9 Exhibit 28.

10 (Exhibit 28 marked for identification.)

11 THE WITNESS: Thank you.

12 Q. (By Ms. Hart) We've marked as  
13 Exhibit 28, a medical document that you produced,  
14 Plaintiff's PHI71.

15 A. Okay.

16 Q. All right. And if you turn to the last  
17 page, which is 74 in the Bates number, it looks  
18 like at the top of the page on March 15th, 2020,  
19 at 2:19 p.m., you -- do you leave a message or did  
20 you send a typed message to Autumn Nelson?

21 A. This would be a typed message.

22 Q. So describe this to me. What is this?

23 A. This was me reaching out to her  
24 regarding the -- using the medication, because I  
25 had been hearing that the steroids were causing

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1 people to have worse cases of COVID if they caught  
2 it, so I was -- or making them more susceptible to  
3 catching it, one of those. And I was just asking  
4 her if she thought I should continue taking my  
5 meds as normal. I just -- I just wanted to know  
6 what I should be doing to protect myself.

7 Q. Okay. So your message is -- we won't  
8 read the whole thing, but at the end of the first  
9 line, "Are there any precautions you want me to be  
10 taking in regards to my asthma and COVID-19  
11 besides the normal wash your hands and clean your  
12 heavy touch surfaces?"

13 Correct?

14 A. Correct.

15 Q. So this is March 15, 2020.

16 And then the next message is Autumn's  
17 response to you, correct?

18 A. Yes.

19 Q. And it's March 16th, 2020, 6:40. I  
20 think that's 6:40 a.m.

21 A. Yes.

22 Q. And she says, "The best thing you can do  
23 is wash your hands, work from home if you are  
24 able. If you have any symptoms, you need to  
25 self-quarantine." Correct?

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1 A. Correct.

2 Yeah, it says a.m. right here

3 (indicating). "Action taken, a.m."

4 Q. Oh, I see it. Right above, yeah. Thank  
5 you.

6 Did you speak to Autumn Nelson on  
7 March 15th or March 16th?

8 MR. ARCINIEGAS: Object to form, vague.

9 Q. (By Ms. Hart) Did you have any verbal  
10 conversations with Autumn?

11 A. No, I did not. On the 15th? No, I did  
12 not.

13 Q. What about on the 16th?

14 A. I don't recall if I -- I don't believe I  
15 talked to her, but I couldn't be positive. But I  
16 believe I e-mailed or messaged with her on the  
17 16th.

18 Q. Okay. And on the next page, the page  
19 before that, 73 at the bottom.

20 A. Okay.

21 Q. March 16th, 8:58 a.m., you write to  
22 Autumn Nelson, "Thank you. And don't stop with  
23 the meds, right?"

24 And she responds, "Correct."

25 Do you agree with me?



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1           A.    Yes.

2           Q.    Had you stopped any of your meds at that  
3 point?

4           A.    No.

5           Q.    And then if you'll flip to the page  
6 before that, 72 at the bottom, March 16, 2020,  
7 6:45 p.m., you write to Autumn Nelson, "I know  
8 your office is probably really busy right now, but  
9 my employer is requiring a doctor's note saying I  
10 have asthma to work from home."

11                   Did you write that?

12          A.    Yes, I did.

13          Q.    Okay. And then Autumn Nelson responds  
14 on March 17th at 7:13 in the morning, "To Whom It  
15 May Concern, Christie Andrews has been a patient  
16 at our office for several years. She has known  
17 asthma. Although well controlled, she would  
18 benefit from working at home due to the rising  
19 risk of COVID-19."

20                   And we've seen that message before,  
21 because that's the note you provided to Tri Star,  
22 correct?

23          A.    Yes. I think she's sending it to Kelly.  
24 Kelly is her nurse. So she sent that to Kelly for  
25 Kelly to print.

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1 Q. Okay. All right. And on the page in  
2 front of that, 69 is the bottom, March 22nd, 2020,  
3 at 2:03 p.m., you message Autumn Nelson to say, "I  
4 have a fever."

5 Correct?

6 A. Yes.

7 Q. And Autumn responds, "Continue to  
8 quarantine. If you're stable, stay home. If you  
9 develop shortness of breath, worsening fever, go  
10 to the ER."

11 Correct?

12 A. Yes.

13 Q. Did you go to the ER?

14 A. I went to the Vanderbilt -- oh, no,  
15 sorry. This was after I went to the Vanderbilt.  
16 So no, because I don't believe I got worse.

17 Q. Okay.

18 A. I don't know.

19 Q. The page in front of that, 68 on the  
20 bottom. On March 22nd, you send a message to  
21 Autumn, and you say, "I would say I have mild  
22 shortness of breath. Nothing crazy like an asthma  
23 attack, but like winded after taking my laundry  
24 out of the machine, which isn't normal for me."

25 You agree it says that?

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1 A. Yes.

2 Q. And that's a message that you sent to  
3 Autumn Nelson, correct?

4 A. Correct.

5 Q. And same question. She responds, "If it  
6 worsens, go to the ER."

7 Did you go to the ER?

8 A. No.

9 Q. Okay.

10 A. I believe I was worried about getting --  
11 that I was coming down with bronchitis, is why I  
12 was communicating.

13 Q. Did you end up coming down with  
14 bronchitis?

15 A. No. My lungs were clear.

16 MS. HART: Exhibit 30.

17 (Exhibit 30 marked for identification.)

18 THE WITNESS: Thank you.

19 Q. (By Ms. Hart) Exhibit 30 is a medical  
20 record. At the bottom it's Tri Star Third Party  
21 Records 25. And this is dated March 24th, 2020,  
22 and it's a progress note from Autumn Nelson.

23 Do you see that?

24 A. Yes.

25 Q. And it says, "Reason for Appointment,

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1 cough, fever, SOB," which I assume is shortness of  
2 breath.

3 Does that sound right to you?

4 A. Yes.

5 Q. Okay. And it says, "Number 2, virtual  
6 face-to-face visit."

7 So did you have a virtual, like a  
8 telehealth visit on the 24th?

9 A. Yes.

10 Q. Okay. And then if we go down to  
11 "Current Medications," you've got Adderall,  
12 Xopenex, Zyrtec, Adderall, Adderall, Singulair not  
13 taking."

14 Were you not taking your Singulair on  
15 March 24 -- on March 24th, 2020?

16 A. Not that I recall. I was still taking  
17 it every day.

18 Q. Okay. And then if you go up just a  
19 little bit under "History of Present Illness,"  
20 there's a number 1, it says, "Sick."

21 Three lines up. Do you see that?

22 A. Yes.

23 Q. Okay. It says, "Sick. She started  
24 coughing last Monday. Cough has been mostly dry.  
25 She developed a fever on Saturday. Highest temp

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1 101. She is short of breath with activity. She  
2 has known asthma. She has not been using her  
3 Xopenex."

4 You agree it says that?

5 A. Yes.

6 Q. So had you not needed your Xopenex?

7 A. No. I had been not using it because I  
8 was worried that I was getting sick and that I  
9 would make the virus spread more, because I  
10 believed that steroids would make it spread more.

11 So I -- and when I thought I was getting  
12 sick, when I developed the fever, I didn't know if  
13 it was a COVID sick or the -- like, a sick from  
14 being -- my immune system being so down from the  
15 asthma attack.

16 Q. Same question we've asked a few times.  
17 On the second page, which is 26 on the bottom,  
18 where it says "Treatment, number 1, cough," the  
19 last sentence there, "She will go to the ER if  
20 shortness of breath, cough or fever worsens."

21 Did you go to the ER on March 24th or  
22 after?

23 A. I thought that I went before the 24th,  
24 but I guess...

25 Q. To the ER?

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1           A.    To the Vanderbilt walk-in clinic. I  
2   thought I went before the 24th.

3           Q.    Okay. But did you go --

4           A.    I did go to Vanderbilt, yes, walk-in.

5           Q.    Just the one time that we talked about?

6           A.    Yes.

7           Q.    Okay.

8           A.    So maybe this was just because this is  
9   the day of the telehealth visit.

10          Q.    When did you reach out to the EEOC?

11          A.    Sorry, I'm still reading this other  
12   piece that has this follow-up from 5/19 -- or  
13   follow-up on 5/19. So I'm confused about the  
14   dates on all of this, on page 26.

15                So okay. Sorry. What was the question  
16   now?

17          Q.    When did you reach out to the EEOC for  
18   the first time?

19          A.    I believe it was sometime in April.

20          Q.    Did you have an attorney when you first  
21   reached out to the EEOC?

22          A.    I did not.

23          Q.    Who was your first attorney?

24          A.    Roland Mumford.

25          Q.    How did you find him?

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1           A.    Through the Tennessee -- it was a  
2   website for Tennessee lawyers.

3           Q.    You found him online; is that fair to  
4   say?

5           A.    Yes.

6           Q.    Did he represent you at the EEOC?

7           A.    No, he did not.

8           Q.    When did you first reach out to him?

9           A.    After I received the Right to Sue from  
10   the EEOC.

11          Q.    Who have you -- what Tri Star employees  
12   have you talked to since your last day of work?

13          A.    You mean -- do you mean who was -- who  
14   did I talk to that was currently employed or,  
15   like, former employees?

16          Q.    Either.  Anybody that's -- have you  
17   talked to anybody that works or worked at Tri Star  
18   since you left?

19          A.    Yeah.

20          Q.    Who?

21          A.    Lots of them.  Ones that were still  
22   working there was -- anyone who, like, reached out  
23   and asked me for help on how to do something, I  
24   would help them.

25          Q.    Who was that?

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1           A.    I know Nola reached out, Lindsey Herman  
2    had reached out. I think Remmy had reached out.  
3    I think Ambra had maybe reached out. I'm not sure  
4    who all had reached out, but if they asked for  
5    help, I helped them.

6           Q.    Nola, Lindsey, Remmy, and Ambra reached  
7    out to you for help on a task?

8           A.    Uh-huh (affirmative response). Just  
9    advice on how to handle something that they didn't  
10   know how to handle it.

11          Q.    What did Nola need help with?

12          A.    I believe it was AmEx-related, but I  
13   can't be completely sure as to what it was.

14          Q.    When was that?

15          A.    Sometime around April or May or --

16          Q.    2020?

17          A.    2020, yeah. Sometime around then.

18          Q.    How many times have you talked to Nola  
19   since your last day?

20          A.    I don't know. It was a lot until --  
21   until people weren't allowed to talk to me  
22   anymore.

23          Q.    What do you mean people weren't allowed  
24   to talk to you?

25          A.    They were told that they weren't



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1 allowed -- Tri Star employees were told not to  
2 talk to me.

3 Q. Who told you that?

4 A. I believe Erin Preyer told me that after  
5 she left Tri Star.

6 Q. What did she tell you?

7 A. That she wasn't allowed to talk to me.

8 Q. When did she tell you that?

9 A. Sometime after. I don't remember  
10 exactly the date.

11 Q. What did Lindsey reach out to you for  
12 help about?

13 A. I believe it was having to do with an  
14 employee AmEx for a touring client.

15 Q. When was that?

16 A. I believe it was around April or May of  
17 2020.

18 Q. How many times have you talked to  
19 Lindsey since you left Tri Star?

20 A. Not that often.

21 Q. More than five?

22 A. No, probably around five.

23 Q. What about Nola, more than five times?

24 A. I think, yes.

25 Q. More than 10?

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1           A.    Yes.  They reached out because I was  
2   terminated.

3           Q.    Okay.  Anything other than what we've  
4   already talked about?

5           A.    I talked to Kristen Mir about it.

6           Q.    Who else?

7           A.    The rest of them it would have been the  
8   same type of, like, I'm sorry and I'm shocked type  
9   things.  Nothing very specific.  I didn't really  
10   want to talk a lot about it afterwards.

11          Q.    Okay.  When did you talk to Kristen  
12   about your termination?

13          A.    That day I talked to her about it, and  
14   then, you know, several times after.  She helped  
15   me write my resumé and stuff like that, too, so...

16          Q.    Have you spoken to any current or former  
17   Tri Star employee about this lawsuit?

18          A.    No.

19          Q.    Who else besides Kristen Mir have you  
20   talked to about your termination?

21                MR. ARCINIEGAS:  Object to form, vague.

22                THE WITNESS:  I talked to a lot of them.

23                I mean, I told you that they reached out.

24          Q.    (By Ms. Hart)  Other than the people  
25   we've already talked about, who else have you

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1 Do you agree it says that?

2 A. I agree it says that. I don't recall  
3 the "angry with everyone."

4 Q. Okay. That's what I was going to ask.  
5 Did you -- are these things that you reported to  
6 Centerstone in May of 2019?

7 Are these things that you reported to  
8 Centerstone?

9 A. Oh, I don't recall the "feeling  
10 irritable or angry with everyone and everything."

11 Q. Okay. What about the other --

12 A. Yes.

13 Q. -- the other -- okay.

14 Those are things you complained to  
15 Centerstone about in May of 2019?

16 A. Yes. I don't know about the "numbness  
17 of muscles," either. But yes, the rest of it is  
18 there, yes.

19 Q. Okay. All right. And if you go down,  
20 there's a paragraph that starts, "When she is  
21 really stressed..."

22 Do you see that?

23 A. Yes.

24 Q. "When she is really stressed, she  
25 doesn't eat. When she is really tired, she eats a

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1 lot. Denies any SI." I assume that's suicidal  
2 ideations. "Feels anxious about her ability to do  
3 her work."

4 Did you tell Centerstone that you had  
5 felt anxious about your ability to do your work?

6 A. I told them that I felt anxious about my  
7 ability to get myself prepared in the morning and  
8 get out the door.

9 Q. Okay.

10 A. I felt very chaotic leaving my house  
11 every day.

12 Q. And then it says, "Has significant  
13 difficult (sic) focusing on just one task at a  
14 time."

15 Did you tell Centerstone that you had  
16 significant difficulty focusing on one task at a  
17 time?

18 A. I told them that it was more difficult  
19 than it usually is on my prescription. So I felt  
20 like I needed my medication evaluated was --

21 Q. Okay. Was that the purpose of this  
22 visit?

23 A. Yes.

24 Q. All right. If you'll flip to the last  
25 page, number 84.

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1 home. I kept telling her I couldn't get my house  
2 in order. I felt like I couldn't get my house  
3 clean. I couldn't do these things. And those  
4 were the type of tasks and work that I was talking  
5 about.

6 I was not referring to, like, the job  
7 that I do every day, though I did feel like I  
8 could have had -- if my medicine had been working,  
9 that I wouldn't have had to try so hard to do all  
10 my work all the time.

11 Q. Okay.

12 MS. HART: All right. We'll mark this  
13 one Exhibit 32.

14 (Exhibit 32 marked for identification.)

15 THE WITNESS: Thank you.

16 Q. (By Ms. Hart) All right. Exhibit 32 is  
17 Tri Star Third Party Records 95, and it's an  
18 Individual Therapy Note, service date 6/25/19.

19 And if you look down to "Symptom  
20 Presentation," it says, "Drift off in meetings.  
21 Have to read everything twice. Have to have  
22 statements repeated. Puts off tedious tasks. Finds  
23 phone in trash. In regard to symptoms of  
24 hyperactivity, client has to hug self and hold self  
25 in seat. Feels like her skin is too tight. Friends

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1 tell me I talk too much."

2 Are these things that you told Centerstone  
3 in June of 2019?

4 A. Sorry, I'm still reading.

5 Q. You're okay. Take your time.

6 A. (Examining.)

7 Yes, this sounds like me. Definitely  
8 skin too tight is something I feel a lot. So yes,  
9 this sounds...

10 Q. Were you able to get these symptoms back  
11 under control after you went to Centerstone?

12 A. So they decided that they thought that I  
13 didn't need a change in my medication. They  
14 thought that I had an undiagnosed sleeping  
15 disorder that was becoming out of control and that  
16 that was what was affecting my ADHD to become  
17 manic, was because I was overly tired from that.

18 Q. Okay. Were you able to get that under  
19 control or is that still something you deal with?

20 A. It's still something I deal with, but  
21 I -- it did -- I did see improvement with the  
22 sleeping schedule.

23 Q. Okay.

24 A. With trying to do the sleeping schedules  
25 and stuff like that.

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1 MS. HART: I'm going to mark this as  
2 Exhibit 33.

3 (Exhibit 33 marked for identification.)

4 THE WITNESS: Thank you.

5 Q. (By Ms. Hart) Exhibit 33 is a document  
6 that you produced of Plaintiff's Production 121.

7 Is this a current copy of your resumé?

8 A. Yes, it is.

9 Q. Is premium services your current  
10 position at Titans?

11 A. Yes. I should update the resumé,  
12 itself, but this is my current version. But I'm  
13 now the premium services supervisor.

14 Q. Okay. But otherwise this is accurate?

15 A. Yes.

16 Q. And the Titans' job is the first  
17 full-time job you had?

18 A. It's part-time.

19 Q. It's part-time? Okay.

20 Tell me about your job with the Titans.

21 A. So I started off as a premium services  
22 assistant, so it's a part-time position that  
23 provides concierge services to the suite holders.

24 Q. So what does that mean? Are you in the  
25 suite during events?

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1 believe so."

2 Q. Okay. And then the second paragraph  
3 says "CP," and I'll just tell you, that's you.  
4 Your attorney can tell you that's you. Charging  
5 party is you.

6 A. Uh-huh (affirmative response).

7 Q. "Indicated that she was informed that at  
8 a staff meeting held on March 20, 2020, the staff  
9 were informed if they were 'too afraid to come to  
10 work, they'd be fired,' and they had already fired  
11 one employee who doesn't want to come in."

12 Did you tell the EEOC that?

13 A. Yes.

14 Q. Okay. Who -- I've got a lot of  
15 questions about this sentence.

16 A. Okay.

17 Q. Who told you about this staff meeting?

18 A. Kristen Mir.

19 Q. When did she tell you?

20 A. I believe it was on the same day that I  
21 was let go.

22 Q. Before or after you were let go?

23 A. After.

24 Q. Okay. So Kristen Mir told you that  
25 there was a staff meeting on March 20, 2020, and



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1 that the staff were informed if they were too  
2 afraid to come to work, they'd be fired, correct?

3 A. Yes.

4 Q. Who did Kristen say said "if they were  
5 too afraid to come to work, they'd be fired"?

6 A. Lou.

7 Q. Did Kristen tell you that -- that Lou  
8 said they had already fired one employee?

9 A. Yes.

10 Q. Okay. Who was that one employee?

11 A. Me. She didn't -- she didn't specify  
12 who the employee was. I'm sorry. "Me" was me  
13 assuming it was me, because I was, I believe, the  
14 only one let go that day.

15 Q. Okay. All right. And then the last  
16 sentence in that second paragraph says, "According  
17 to CP, an hour after the meeting, CP was the first  
18 person in the company to be let go."

19 Do you see that?

20 A. Yes.

21 Q. Did you tell the EEOC that?

22 A. Yes.

23 Q. Okay. Well, she couldn't have been  
24 talking about you at the meeting if you were let  
25 go after the meeting, right?